

# **EXHIBIT 6**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

JAMES CONTANT, et al.,

Plaintiffs,

v.

BANK OF AMERICA CORPORATION, et al.,

Defendants.

No. 1:17-cv-3139-LGS

**DECLARATION IN  
SUPPORT OF MUFG  
BANK, LTD.'S  
MOTION TO DISMISS  
FOR LACK OF PERSONAL  
JURISDICTION**

Lynne Stoullil declares under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

1. I am a Managing Director, U.S. Head of Employee Relations for MUFG Union Bank, N.A., with responsibilities over the New York Branches of MUFG Bank, Ltd. ("MUFG Bank"). I submit this declaration in support of MUFG Bank's motion to dismiss the above-captioned action for lack of personal jurisdiction. The facts stated herein are true and correct, to the best of my knowledge, based on records maintained by MUFG Bank in the ordinary course of business and MUFG Bank public disclosures.

2. MUFG Bank is a financial institution incorporated in Japan under the Company Law. Its headquarters are and have been located at 2-7-1, Marunouchi, Chiyoda-ku, Tokyo, Japan. MUFG Bank's principal place of business is and has been in Japan. MUFG Bank was formerly known by the name The Bank of Tokyo-Mitsubishi UFJ, Ltd.

3. Currently, MUFG Bank has two branches in New York, located at 1251 Avenue of the Americas, New York, NY 10020, and 1221 Avenue of the Americas, New York, NY 10020. These two branches are adjacent to each other and effectively function as a single branch.

4. Currently, MUFG Bank has two other branches in the United States (in Chicago, Illinois, and Los Angeles, California), and eight other banking or representative offices or agencies in the United States. MUFG Bank also has several subsidiaries in the United States.

5. Due to an integration of MUFG Bank's U.S. operations with its indirect U.S. subsidiary, MUFG Union Bank, N.A., starting in July 2014, MUFG Bank no longer maintains employee headcount records for its U.S.-based employees segregated from those maintained for MUFG Union Bank, N.A.

5.1 As of March 2016, there were 1,408 full-time employees of MUFG Bank (and affiliated entities, including MUFG Union Bank, N.A.) in New York, or 4.0% of the 34,865 full-time employees of MUFG Bank worldwide.

5.2 As of March 2017, there were 1,596 full-time employees of MUFG Bank (and affiliated entities, including MUFG Union Bank, N.A.) in New York, or 4.6% of the 34,276 full-time employees of MUFG Bank worldwide.

5.3 As of March 2018, there were 1,680 full-time employees of MUFG Bank (and affiliated entities, including MUFG Union Bank, N.A.) in New York, or 4.9% of the 34,101 full-time employees of MUFG Bank worldwide.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge, information and belief, based on records maintained by MUFG Bank in the ordinary course of business and MUFG Bank public disclosures.

Executed on December 19, 2018 in Tempe, Arizona.

  
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Lynne Stouil